

REDACTED - PUBLICLY FILED VERSION

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December 23, 2014

VIA ECF AND HAND DELIVERY

Hon. George B. Daniels
United States District Judge
United States District Court
for the Southern District of New York
500 Pearl Street
New York, New York 10007-1312

Re: *Sokolow, et al. v. Palestinian Liberation Organization, et al.*
Docket No. 04-CV-397 (GBD)(RLE)

Dear Judge Daniels:

I respectfully write to request that in advance of trial the Court exclude any evidence or testimony on two matters.

1. Benjamin Blutstein

Ben Blutstein was killed in a terrorist attack while eating lunch at the Hebrew University cafeteria. The Court should forbid defendants from asking questions or offering evidence relating to [REDACTED]. Any evidence related to these allegations should be excluded under Federal Rules of Evidence 401 and 403 as it is irrelevant, has no probative value and creates a substantial danger of unfair prejudice.

Defendants repeatedly asked Ben's mother during her deposition whether Ben [REDACTED] (7/12/2012 Katherine Baker Dep. at 42-45; 74-84). In order to ensure that Ben's family is not subject to this harassing and irrelevant line of questioning at trial, we respectfully request in advance of trial that the Court exclude any evidence or testimony relating to any [REDACTED]

2. Mark Sokolow

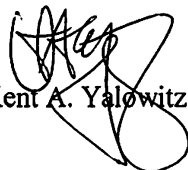
I also request that in advance of trial the Court exclude any evidence or testimony regarding plaintiff Mark Sokolow's employment as Senior Counsel at Arnold & Porter. As I told the Court on July 22, 2014, Mark became a member of the Corporate and Securities practice at Arnold & Porter in July 2014 over a year after I became lead counsel in this matter. Mr. Sokolow is not acting as trial counsel in this case, and he has

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not been a member of the trial team. He is merely a party and witness. Any evidence related to Mr. Sokolow's employment at my firm should be excluded under Federal Rules of Evidence 401 and 403 as it is irrelevant, has no probative value and would confuse or mislead the jury.

Respectfully,


Kent A. Yalowitz

cc: Brian A. Hill (via e-mail)